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July 25, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization  
**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

On Thursday, July 21, 2011, my client, L-1 Identity Solutions, conducted an oral, ex parte presentation with Commission staff to discuss with them ways to address the managing of Lifeline and Link-Up subscriber information to prevent waste, fraud and abuse from duplicate enrollment in the Lifeline and Link-Up Program funded by USF's Low Income Fund. It was acknowledged by Commission staff that the program, administered by the states, generally permits self-certification and that some states require third-party documentation or certification of eligibility. There have been allegations of waste, fraud and abuse in the program, that subscribers are enrolled with more than one provider, that more than one individual per household may be enrolled or that other situations may have occurred.

L-1 Identity Solutions identified itself as the provider of driver's licenses for 45 states, the provider of secured credentialing for the U.S. government in particular agencies and a provider of national identification secured credentialing for several countries (national ID and voter ID). L-1's representative, Mr. Jamie Gagnon, explained the nature of L-1's services and their application to the business problem faced by the Commission.

Mr. Gagnon and the Commission staff discussed the Commission's efforts in addressing duplicate subscriptions and generally focused on a two-step approach to eliminating and avoiding duplication. Sample, existing provider databases have been merged, with duplicates identified and subscribers contacted to choose a provider within a specified time frame, or that a provider will be chosen for them, thus limiting them to one subscriber.

The second business problem issue faced by the Commission involves the need for and challenges of

4160 Notice of Ex Parte 072511

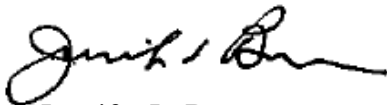
implementing verified benefits enrollment, that is, identifying eligibility prior to or at the time of enrollment to prevent duplicate enrollment at the time of subscription so as to preserve use of the funds for those for whom the fund was intended to benefit, according to statute and rules.

Discussion centered on how the Lifeline and Link-Up program operates, including the existence of eight (8) other benefit programs that determine eligibility for Lifeline and Link-Up. Discussion further centered on how to manage that information between states, on whether individual states would be able to screen electronically for eligibility and on third-party administration of implementing such a verification program. It was acknowledged that policy considerations exist regarding the relative cost of such a program as it bears relation to the monthly cost of the benefits provided by the Lifeline and Link-Up Programs and that further discussion is needed. The need for inter-database communication and data comparison was acknowledged. It was discussed that similar arrangements exist as are described in the Help America Vote Act regarding comparison of statewide voter registration databases with state motor vehicle databases and the federal Social Security Administration database.

The need to file an ex parte notice was discussed, along with the referenced docket 11-42. Commission staff attendees are noted in the "cc" designation below, and others in attendance besides Mr. Gagnon and myself included Vaughn Sizemore of Public Sector Resources in Columbus, Ohio, and George Korn, Professor, Ohio University.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions regarding this letter, please communicate directly with the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer L. Brunner", with a stylized, flowing script.

Jennifer L. Brunner

cc: Kimberly Scardino  
Cindy Spiers  
Jonathan Lechter  
Keston Pierre  
Thomas Buckley